



participant, Ms. Riggleman, that was not cashed and not re-deposited in the Plan account; and \$3,150.97 was paid in the form of one check to the IRS connected with the check to Ms. Riggleman that was never cashed.

Exh. 1.

- B. I reviewed the Plan's Annual Report Forms 5500, and credited as distributions the amounts claimed therein. Distributions totaling \$178,550 were reported on the Annual Report Form 5500 for the 2011 through 2016 Plan years, of which, all was paid to or used for the benefit of Sherrod. Distributions totaling \$135,187 were reported on the Annual Report Form 5500 for the 2017 Plan year, of which, \$66,369.99 appears to have been paid directly or indirectly to participants and beneficiaries and \$68,817 was paid directly to or used for the benefit of Sherrod. Exh. 1.
- C. In total, \$786,220 was calculated as paid to or used for the benefit of Sherrod and not accounted for as distributions to Sherrod. Exh. 1.
- D. During the period of January 1, 2014 to December 31, 2017, there were no deposits into the Plan account.
- E. For the period January 1, 2011 through December 31, 2017, estimated losses to participants and beneficiaries totaled \$107,629.45 and were determined by allocating actual distributions, gains, and losses to the associated Plan participants and beneficiaries.

4. Lost opportunity costs were computed from January 1, 2018 through December 31, 2020, using Internal Revenue Code 6621 interest rates for the period of January 1, 2018 to March 31, 2020. The total estimated loss opportunity costs is \$17,728.94. Exh. 2.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: This 21 day of February 2020.

  
**AMANDA HODGES**  
EBSA Investigator

<u>Check No.</u>	<u>Date</u>	<u>Amount</u>	<u>Exhibit</u>
<b>2011 Activity</b>			
Wire	11/10/2011	\$ 3,000.00	DOL002070
Wire	11/10/2011	\$ 250,000.00	DOL002069
<b>Total</b>		<b>\$ 253,000.00</b>	
<b>AR 5500 Benefits Paid</b>		<b>\$ -</b>	
<b>Loss</b>		<b>\$ 253,000.00</b>	
<b>2013 Activity</b>			
4014562564	7/16/2013	\$ 18,000.00	DOL004391
4014562562	7/16/2013	\$ 32,000.00	DOL004396
4015447616	12/24/2013	\$ 12,603.88	DOL002301 and DOL001601
4015447618	12/24/2013	\$ 3,150.97	DOL002301 and DOL001601
<b>Total</b>		<b>\$ 65,754.85</b>	
<b>AR 5500 Benefits Paid</b>		<b>\$ -</b>	
<b>Loss</b>		<b>\$ 65,754.85</b>	
<b>2014 Activity</b>			
4015600963	1/22/2014	\$ 10,000.00	DOL004392
4015600977	1/22/2014	\$ 10,000.00	DOL004393
4015600959	1/22/2014	\$ 10,000.00	DOL004394
4015600972	1/22/2014	\$ 10,000.00	DOL004395
4015600951	1/22/2014	\$ 10,000.00	DOL004397
			DOL002298,DOL004398 and
4015704911	2/11/2014	\$ 10,000.00	DOL002312
			DOL002298,DOL004398 and
4015705847	2/11/2014	\$ 10,000.00	DOL002312
			DOL002298,DOL004398 and
4015705854	2/11/2014	\$ 10,000.00	DOL002312
			DOL002298,DOL004398 and
4015705858	2/11/2014	\$ 10,000.00	DOL002312
202927383	3/4/2014	\$ 57,405.00	DOL2374 and DOL2375
202927402	3/4/2014	\$ 5,000.00	DOL2376 and DOL2377
202927403	3/4/2014	\$ 5,000.00	DOL2378 and DOL2379
202927404	3/4/2014	\$ 5,000.00	DOL2380 and DOL2381
202927407	3/4/2014	\$ 3,000.00	DOL2382 and DOL2383
202927408	3/4/2014	\$ 3,000.00	DOL2384 and DOL2385
324972964	4/15/2014	\$ 5,000.00	DOL2386 and DOL2387
324972965	4/15/2014	\$ 5,000.00	DOL2388 and DOL2389
324972966	4/15/2014	\$ 5,000.00	DOL2390 and DOL2391
324972969	4/15/2014	\$ 5,000.00	DOL2392 and DOL2393
324972972	4/15/2014	\$ 5,000.00	DOL2396 and DOL2397
324972975	4/15/2014	\$ 2,000.00	DOL2398 and DOL2399
202940360	4/28/2014	\$ 5,000.00	DOL2400 and DOL2401
202940361	4/28/2014	\$ 5,000.00	DOL2402 and DOL2403
202940362	4/28/2014	\$ 5,000.00	DOL2404 and DOL2405
202940365	4/28/2014	\$ 2,000.00	DOL2406 and DOL2407
325019689	5/27/2014	\$ 10,000.00	DOL2408 and DOL2409
325019690	5/27/2014	\$ 10,000.00	DOL2410 and DOL2411
325019691	5/27/2014	\$ 10,000.00	DOL2412 and DOL2413
325019692	5/27/2014	\$ 10,000.00	DOL2414 and DOL2415
325019693	5/27/2014	\$ 10,000.00	DOL2416 and DOL2417
325047634	6/17/2014	\$ 1,000.00	DOL2418 and DOL2419
325097478	7/28/2014	\$ 5,000.00	DOL2420 and DOL2421
202970019	9/23/2014	\$ 5,500.00	DOL2422 and DOL2423
202976268	10/27/2014	\$ 4,000.00	DOL2424 and DOL2425
202976270	10/27/2014	\$ 3,000.00	DOL2426 and DOL2427
202981350	11/24/2014	\$ 5,000.00	DOL2428 and DOL2429
202981351	11/24/2014	\$ 5,000.00	DOL2430 and DOL2431
<b>Total</b>		<b>\$ 290,905.00</b>	
<b>AR 5500 Benefits Paid</b>		<b>\$ 57,000.00</b>	
<b>Loss</b>		<b>\$ 233,905.00</b>	

**2015 Activity**

202989558	1/5/2015	\$	5,000.00	DOL2432 and DOL2433
202989559	1/5/2015	\$	5,000.00	DOL2434 and DOL2435
202989560	1/5/2015	\$	4,440.00	DOL2436 and DOL2437
202995568	2/5/2015	\$	5,000.00	DOL2438 and DOL2439
202995569	2/5/2015	\$	5,000.00	DOL2440 and DOL2441
202995570	2/5/2015	\$	4,440.00	DOL2442 and DOL2443
204003666	3/2/2015	\$	5,000.00	DOL2444 and DOL2445
204003667	3/2/2015	\$	4,000.00	DOL2446 and DOL2447
204010400	4/6/2015	\$	5,000.00	DOL2448 and DOL2449
204010405	4/6/2015	\$	4,444.00	DOL2450 and DOL2451
325460857	4/22/2015	\$	4,444.00	DOL2452 and DOL2453
325460863	4/22/2015	\$	5,000.00	DOL2454 and DOL2455
204022191	6/1/2015	\$	5,000.00	DOL2456 and DOL2457
204022195	6/1/2015	\$	2,700.00	DOL2458 and DOL2459
204028163	7/1/2015	\$	5,000.00	DOL2460 and DOL2461
204028164	7/1/2015	\$	4,444.00	DOL2462 and DOL2463
204034983	8/10/2015	\$	4,444.00	SUN. 12.9.16000354
204034982	8/10/2015	\$	4,444.00	SUN. 12.9.16000353
204036871	8/19/2015	\$	4,444.00	SUN. 12.9.16000352
204036870	8/19/2015	\$	4,444.00	SUN. 12.9.16000351
204046558	10/8/2015	\$	5,000.00	SUN. 12.9.16000350
204046560	10/8/2015	\$	4,444.00	SUN. 12.9.16000349
325694796	10/21/2015	\$	5,000.00	SUN. 12.9.16000348
325694789	10/21/2015	\$	4,444.00	SUN. 12.9.16000347
204056886	11/30/2015	\$	5,000.00	SUN. 12.9.16000357
204056951	11/30/2015	\$	4,440.00	SUN. 12.9.16000356

<b>Total</b>	<b>\$ 120,016.00</b>
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<b>AR 5500 Benefits Paid</b>	<b>\$ 59,000.00</b>
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<b>Loss</b>	<b>\$ 61,016.00</b>
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**2016 Activity**

204066612	1/6/2016	\$	4,444.00	SUN. 12.9.16000364
204066611	1/6/2016	\$	4,444.00	SUN. 12.9.16000363
325852290	2/1/2016	\$	5,000.00	SUN. 12.9.16000362
325852289	2/1/2016	\$	4,444.00	SUN. 12.9.16000361
204076342	2/22/2016	\$	5,000.00	SUN. 12.9.16000360
204076205	2/22/2016	\$	4,444.00	SUN. 12.9.16000359
204085476	4/4/2016	\$	5,000.00	SUN. 12.9.16000373
204085479	4/4/2016	\$	4,444.00	SUN. 12.9.16000372
325964645	4/18/2016	\$	5,000.00	SUN. 12.9.16000371
325964642	4/18/2016	\$	4,444.00	SUN. 12.9.16000370
326007954	5/18/2016	\$	5,000.00	SUN. 12.9.16000369
326007952	5/18/2016	\$	4,444.00	SUN. 12.9.16000368
326064519	6/28/2016	\$	5,000.00	SUN. 12.9.16000367
326064518	6/28/2016	\$	4,444.00	SUN. 12.9.16000366
326109553	7/29/2016	\$	5,000.00	SUN. 12.9.16000380
326109551	7/29/2016	\$	4,444.00	SUN. 12.9.16000379
326158478	9/1/2016	\$	5,000.00	SUN. 12.9.16000377
326158475	9/1/2016	\$	4,444.00	SUN. 12.9.16000378
326189398	9/27/2016	\$	5,000.00	SUN. 12.9.16000376
326189394	9/27/2016	\$	4,444.00	SUN. 12.9.16000375
204130836	10/17/2016	\$	18,255.50	SUN. 12.9.16000390
326230721	10/27/2016	\$	5,000.00	SUN. 12.9.16000389
326230720	10/27/2016	\$	4,444.00	SUN. 12.9.16000388
326267708	11/22/2016	\$	20,000.00	SUN. 12.9.16000387
326267704	11/22/2016	\$	5,000.00	SUN. 12.9.16000386
326267701	11/22/2016	\$	4,444.00	SUN. 12.9.16000385
326339910	12/21/2016	\$	18,000.00	SUN. 12.9.16000391
326339906	12/21/2016	\$	5,000.00	SUN. 12.9.16000384
326339903	12/21/2016	\$	4,444.00	SUN. 12.9.16000383
204148192	12/27/2016	\$	18,000.00	SUN. 12.9.16000382

<b>Total</b>	<b>\$ 196,471.50</b>
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<b>AR 5500 Benefits Paid</b>	<b>\$ 62,550.00</b>
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<b>Loss</b>	<b>\$ 133,921.50</b>
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**2017 Activity**

326403508	2/2/2017	\$	4,444.00	SunTrust2018000203 & SunTrust2018000204
326403509	2/2/2017	\$	5,000.00	SunTrust2018000205 & SunTrust2018000206
326442329	3/2/2017	\$	4,444.00	SunTrust2018000207 & SunTrust2018000208
326442330	3/2/2017	\$	4,444.00	SunTrust2018000209 & SunTrust2018000210
326495122	4/3/2017	\$	5,000.00	SunTrust2018000213 & SunTrust2018000214
326495118	4/3/2017	\$	4,444.00	SunTrust2018000211 & SunTrust2018000212
326499614	4/4/2017	\$	8,932.91	SunTrust2018000217 & SunTrust2018000218
326499608	4/4/2017	\$	8,932.91	SunTrust2018000215 & SunTrust2018000216
326535454	5/1/2017	\$	4,444.00	SunTrust2018000219 & SunTrust2018000220
326535456	5/1/2017	\$	5,000.00	SunTrust2018000221 & SunTrust2018000222
326577949	6/2/2017	\$	4,444.00	SunTrust2018000223 & SunTrust2018000224
326577950	6/2/2017	\$	5,000.00	SunTrust2018000225 & SunTrust2018000226
326586248	6/7/2017	\$	11,798.93	SunTrust2018000227 & SunTrust2018000228
326592317	6/13/2017	\$	2,701.69	SunTrust2018000229 & SunTrust2018000230
326602204	6/21/2017	\$	3,582.62	SunTrust2018000231 & SunTrust2018000232
326605744	6/26/2017	\$	1,720.93	SunTrust2018000233 & SunTrust2018000234
204191281	6/27/2017	\$	28,700.00	SunTrust2018000179 & SunTrust2018000180
204195981	7/24/2017	\$	9,000.00	SunTrust2018000181 & SunTrust2018000182
204195982	7/24/2017	\$	9,000.00	SunTrust2018000183 & SunTrust2018000184
204195996	7/24/2017	\$	5,000.00	SunTrust2018000185 & SunTrust2018000186
204202478	8/29/2017	\$	4,444.00	SunTrust2018000187 & SunTrust2018000188
204207160	9/18/2017	\$	5,000.00	SunTrust2018000189 & SunTrust2018000190
204210814	10/5/2017	\$	5,000.00	SunTrust2018000191 & SunTrust2018000192
204210815	10/5/2017	\$	4,444.00	SunTrust2018000193 & SunTrust2018000194
326782257	11/2/2017	\$	5,000.00	SunTrust2018000237 & SunTrust2018000238
326782253	11/2/2017	\$	4,444.00	SunTrust2018000235 & SunTrust2018000236
204222763	12/4/2017	\$	5,000.00	SunTrust2018000195 & SunTrust2018000196
204222764	12/4/2017	\$	4,444.00	SunTrust2018000197 & SunTrust2018000198

<b>Total</b>	<b>\$ 173,809.99</b>
<b>AR 5500 Benefits Paid</b>	<b>\$ 135,187.00</b>
<b>Loss</b>	<b>\$ 38,622.99</b>

<b>Total Loss - 2011 to 2017:</b>	<b>\$ 786,220.34</b>
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**Estimated Losses to Plan Participants**

<b>Loss Description</b>	<b>Loss Amount</b>
Estimated Account Balances as of 12/31/2017	\$ 107,629.45
Estimated Lost Opportunity Cost through 12/31/2020	<u>\$ 17,728.94</u>
Estimated Amount Owed	\$ 125,358.39

**IRC Rates for Lost Opportunity Cost Estimate**

<b>Quarter Beginning</b>	<b>IRC 6621(a) Rates</b>
1/1/2018	4.00%
4/1/2018	5.00%
7/1/2018	5.00%
10/1/2018	5.00%
1/1/2019	6.00%
4/1/2019	6.00%
7/1/2019	5.00%
10/1/2019	5.00%
1/1/2020	5.00%